

The proposed 3-tier structure provides a sound basis for the growth and development of the Amateur Service for the next few decades. There is no practical way to restructure the present system in a way that does not generate some controversy, but this proposal is a good compromise.

The requirements for the proposed entry-level class are reasonable and should promote growth of the Service. I would suggest that the term "Novice" has connotations that some might find objectionable. If there is resistance to the name, perhaps "Communicator" might have wider acceptance.

The proposal to consolidate Technician, Technician Plus, and General classes into a reconstituted General Class is reasonable and, given current global trends, the lack of any Morse requirement is reasonable.

Merging the current Advanced and Extra classes into a new Extra class also makes sense. Given current trends, Advanced Class operators share more with the Extra Class, in terms of demonstrated skills, than they do with the General Class. As Advanced Class licenses are no longer being issued, simply keeping them on the books represents a less-than-optimum solution. Given the restructuring proposals now current, including Advanced Class operator in the new Extra Class is no longer a matter of "upgrading", but rather an association of operators with quite similar levels of proficiency.

I view the retention of a 5 WPM Morse requirement for the Extra as reasonable. The highest license class in the Amateur Service should be characterized by both a high level of technical expertise and operating skill. Practical testing cannot assess skill in most areas while a minimal examination with respect to Morse can do so.

The "refarming" elements with respect to sub-bands is reasonable, given the mix of classes and privileges which is proposed.

I should note that integration of elements of this proposal with RM-10870 may provide very much of a consensus solution to the restructuring debate.